

EXHIBIT A

*Plaintiff's Responses and Objections to
Defendants' First Set of Requests for Production*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CASE NO.: 1:23-cv-1823

DOMINIC GWINN,

Plaintiff,

v.

CITY OF CHICAGO, and DAVID O'NEAL
BROWN,

Defendants.

**PLAINTIFF DOMINIC GWINN'S RESPONSES AND OBJECTIONS TO DEFENDANTS
CITY OF CHICAGO and DAVID O'NEAL BROWN' EXPEDITED REQUESTS FOR
PRODUCTION OF DOCUMENTS**

Plaintiff DOMINIC GWINN, by and through his undersigned counsel, and pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby serves his Responses and Objections to Defendants City of Chicago and David O'Neal Brown's First Request for Production of Documents. Plaintiff Gwinn reserves the right to supplement or amend these Responses, as necessary as the discovery period continues and investigation into these claims progresses.

REQUESTS FOR INSPECTION AND PRODUCTION

1. A copy of the application that plaintiff filed in the U.S. Copyright Office for the "Work" that resulted in Copyright Reg. No. PA 2-255-761.

RESPONSE: Plaintiff is not in possession of any documents responsive to this Request.

2. A copy of the "Work" that was filed with or deposited in the U.S. Copyright Office in connection with plaintiff's application for the "Work" that resulted in Copyright Reg. No. PA 2-255-761.

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RESPONSE: Plaintiff identifies file GWINN 0001 as responsive to this Request.

3. Copies of all documents and communications sent by plaintiff to the U.S. Copyright Office in connection with plaintiff's copyright application for the "Work" and Reg. No. PA 2-255-761.

RESPONSE: Plaintiff is not in possession of any documents responsive to this Request.

4. Copies of all documents and communications from the U.S. Copyright Office which refer or related to plaintiff's copyright application for the "Work" and Reg. No. PA 2-255-761.

RESPONSE: Plaintiff identifies documents labeled GWINN 0002 – 0003 as responsive to this Request.

5. All documents and communications that plaintiff received from local and national news reporters seeking authorization to use plaintiff's footage as alleged in paragraph number 17 of the complaint.

RESPONSE: Plaintiff identifies documents labeled GWINN 0004 – 0014 as responsive to this Request.

6. All documents and communications which relate or refer to plaintiff offering reporters and news services a limited license to display portions of the "work" as alleged in paragraph number 18 of the complaint.

RESPONSE: Plaintiff identifies documents labeled GWINN 0004 – 0014 as responsive to this Request.

7. Documents which show the date when plaintiff first became aware that defendants displayed the "work" at a press conference on or around July 20, 2020, as alleged in paragraph number 22 of the complaint.

RESPONSE: Plaintiff is not in possession of any documents responsive to this Request.

8. Documents which show the “portion of the Work” used by news outlets that reported on defendants’ press conference as alleged in paragraph number 32 of the complaint.

RESPONSE: Plaintiff identifies documents labeled GWINN 0015 – 0033 as responsive to this Request.

9. All documents regarding plaintiff’s discovery that the “Work” was being displayed on multiple local and national media platforms as alleged in paragraph number 34 of the complaint.

RESPONSE: Plaintiff identifies documents labeled GWINN 0015 – 0033 as responsive to this Request.

Dated: September 15, 2023

Respectfully submitted,

/s/Evan A. Andersen

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Counsel for Plaintiff Dominic Gwinn

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on September 15, 2023, a true and correct copy of the foregoing document was served by electronic mail to all parties listed below on the Service List.

/s/Evan A. Andersen

EVAN A. ANDERSEN

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